

RECEIVED

AUG 23 1995

July 20, 1995

JUL 20 5 44 PM '95  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, NW  
Room 814  
Washington, DC 20554

87-268

Dear Chairman Hundt:

The undersigned are individuals and a wide variety of civil rights, educational, media advocacy, consumer, philanthropic, religious, campaign finance reform and children's advocacy organizations that are deeply interested in the Commission's upcoming digital television rule-making.

We are writing to urge you to ensure that the Commission seeks public comment on a broad range of issues in this rulemaking. We are most concerned that the Commission ask questions regarding possible public interest related uses for digital television.

As you know, the conversion to digital broadcasting presents numerous opportunities for increased information, diversity and access. Therefore, organizations like ours consider this proceeding to be the among the most important in which the Commission will engage in the near future. We plan to participate fully and vigorously.

But the Commission must not stifle the debate by omitting discussion of critical issues. Broadcasters are asking the Commission for an extra block of publicly-owned spectrum that will permit them to operate multiple program and non-program services. We believe that under the Communications Act's mandate that the FCC license broadcasters in the "public interest, convenience and necessity," the Commission has a duty, *at the very least*, to solicit public comment on whether there should be some enhanced public interest obligations attendant to the grant of the supplemental spectrum. Indeed, the pending telecommunications legislation in both the House and the Senate would require the Commission to consider the public interest when granting licenses for digital television.

We are not here asking the Commission to judge the merits of whether broadcasters should give something back to the public in exchange for the use of the extra spectrum. We are asking only that the public be permitted to comment on such a proposal. We hope that the Commission believes, like we do, that increased public discussion of this important matter is better for everyone involved in this proceeding.

Sincerely,

rec. of Copies rec'd  
DATE CODE

0

Advocates for Children and Youth

American Library Association

Benton Foundation

Black Citizens for a Fair Media

Center for Democracy and Technology

Center for Media Education

Peggy Charren

Chinese for Affirmative Action

Common Cause

Consumer Federation of America

Consumers Union

Henry Geller

Citizens Communication Center Project - Institute for Public Representation - Georgetown University Law Center

Media Access Project

National Black Child Development Institute

Minority Media and Telecommunications Council

National Association for Family and Community Education

National Association of Elementary School Principals

National Campaign for Freedom of Expression

National Education Association

National School Boards Association

Office of Communication of the United Church of Christ

Parent Action

Rev. Everett C. Parker

People for the American Way

Philadelphia Lesbian and Gay Task Force

United States Catholic Conference

Taxpayers Assets Project

Washington Area Citizens Coalition Interested in Viewers' Constitutional Rights

Wider Opportunities for Women

Women's Institute for Freedom of the Press

July 20, 1995

Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Room 814  
Washington, DC 20554

RECEIVED

AUG 23 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

87-268

Dear Sir :

I am writing to urge you to ensure that the Commission asks pertinent *public interest related questions* in the upcoming digital television rulemaking.

This letter is being sent on my own behalf and that of my family. My personal concern is that in an era when government support for public broadcasting is being necessarily curtailed, educational and public interest (read commercially unprofitable) programming may be severely affected. At the same time commercial interests may feel no obligation to provide anything more substantial than 16 varieties of the Home Shopping Club.

It is my opinion that if public funding is not available to support programming of educational and cultural value, then the onus to support and provide that programming falls upon those who profit from the use of the medium. Rather than seeing this based upon monetary profits which any good accountant can cause to vanish, I would prefer to see a portion of any commercially licensed bandwidth be designated solely for PBS use with no exceptions.

As you know, the conversion to digital broadcasting will change the face of television as we have known it. Broadcasters are asking the Commission for an extra block of publicly-owned spectrum that will permit them to engage in a myriad of program and non-program services. We believe, therefore, that it is self-evident that public should be permitted to comment on whether there should be some enhanced public interest obligations attendant to the grant of the supplemental spectrum.

Whatever one thinks of the idea of having broadcasters give something back to the public in exchange for the use of extra spectrum, *at the very least* the public should be allowed to comment on such a proposal.

Thank you for your consideration.

Sincerely,



Richard N. Jenkins

No. of Copies rec'd \_\_\_\_\_  
List A B C D E

0

Department of Management Information Systems  
Karl Eller Graduate School of Management  
College of Business and Public Administration

THE UNIVERSITY OF  
**ARIZONA**  
TUCSON ARIZONA

87-268

McClelland Hall  
Tucson, Arizona 85721  
(602) 621-2748

July 14, 1995

**RECEIVED****AUG 23 1995**

Commissioner Reed E. Hundt  
Federal Communications Commission  
1919 M Street, NW  
8th Floor, Room 814  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Commissioner Hundt:

I am writing to urge you to ensure that the Commission asks pertinent public interest related questions in the upcoming digital television rule making. As an educator and researcher at the University of Arizona, I am appalled that so little broadcasting capability in America is used for constructive purposes; it is handed over to those commercial providers who can raise enough capital to support their endeavors. Why isn't some of this capability guaranteed for more productive usage, for programming about international news, self-paced instruction programs, cultural enrichment and foreign language broadcasts? It has been well-documented that violent and sensational entertainment, which uses TELEVISION BANDWIDTH as one of its main distribution channels, has promoted a rise in crime and moral degradation. Are you willing to be responsible for an acceleration of this trend, by giving more bandwidth to fewer providers?

As you know, the conversion to digital broadcasting will change the face of television as we have known it. Broadcasters are asking the Commission for an extra block of publicly-owned spectrum that will permit them to engage in a myriad of program and non-program services. We believe, therefore, that it is self-evident that public should be permitted to comment on whether there should be some enhanced public interest obligations attendant to the grant of the supplemental spectrum.

There has already been some public debate as to whether broadcasters should be required to provide free time to political candidates or should have enhanced children's television obligations in return for use of the extra spectrum. We believe that these are just some of the possibilities. The Commission should therefore ask broad, open-ended questions about possible public interest uses for the spectrum.

Thank you for your consideration.

*Ann K. Danowitz*  
Ann K. Danowitz  
Research Specialist



No. of Copies rec'd 0  
List A B C D E

JG  
RECEIVED

AUG 23 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

7/15/95

Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, NW  
8th Floor  
Washington, DC 20554

87-268

Dear Chairman Hundt:

I am writing to urge you to ensure that the Commission asks pertinent public interest related questions in the upcoming digital television rule making.

Stein Computer Consultants is interested in seeing an expansion of public interest and children's non commercial programming. As providers of Medical Management software we are familiar with and share the opinion of the medical community on this matter. You have a unique opportunity to provide a new direction in the use of the broadcast media and the public interest.

As you know, the conversion to digital broadcasting will change the face of television as we have known it. Broadcasters are asking the Commission for an extra block of publicly-owned spectrum that will permit them to engage in a myriad of program and non-program services. We believe, therefore, that it is self-evident that public should be permitted to comment on whether there should be some enhanced public interest obligations attendant to the grant of the supplemental spectrum.

There has already been some public debate as to whether broadcasters should be required to provide free time to political candidates or should have enhanced children's television obligations in return for use of the extra spectrum. We believe that these are just some of the possibilities.

No. of Copies rec'd \_\_\_\_\_  
Listed CDE \_\_\_\_\_

0

The Commission should therefore ask broad, open-ended questions about possible public interest uses for the spectrum.

Whatever one thinks of the idea of having broadcasters give something back to the public in exchange for the use of extra spectrum, at the very least, the public should be allowed to comment on such a proposal. To do otherwise would stifle the debate in what may be the best, last chance to promote democracy in the mass media.

Thank you for your consideration.

Sincerely,

Dan Stein  
President

RECEIVED

AUG 23 1995

Massachusetts Institute of Technology

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

## FAX Transmission Form

To: Hon. Reed E. Hundt, Chair  
Address: FCC, RM 814  
FAX Number: 202-418-2801  
Notes: Hard copy to follow  
in mail

---

From: Prof. William F. Schreiber  
Address: MIT 36-545, 617-253-2579 (phone)  
FAX Number 617-253-7302  
Notes: \_\_\_\_\_  
\_\_\_\_\_

---

Pages  
Transmitted: 3  
(including this form)

Contact Person:

Deborah Manning

Contact Telephone:

617-253-1915

RECEIVED

AUG 23 1995



DEPARTMENT OF ELECTRICAL ENGINEERING AND COMPUTER SCIENCE

MASSACHUSETTS INSTITUTE OF TECHNOLOGY

36-545 MIT, CAMBRIDGE, MASSACHUSETTS 02139-4307

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARYWilliam F. Schreiber  
Professor of Electrical Engineering,  
Emeritus

20 July 1995

Hon. Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M. St.  
Washington DC 20554

87-268

## DIGITAL TELEVISION RULE-MAKING

Dear Mr. Chairman:

As one who has participated in and closely followed the FCC HDTV proceedings, starting in 1987, I write to urge you to ensure that the public has an ample opportunity to comment on the proposed digital television rule-making.

The grant of an extra channel to existing license holders without considering applications from others is unprecedented on its face. Since most current Commissioners were not in office during most of the current proceedings, a short review is in order.

An important milestone in the HDTV proceedings was the announcement by Zenith in 1988 that it was possible to transmit HDTV in a single 6-MHz channel at such low power that the taboo channels could be used. The proviso was the the HDTV system had to be entirely new and could not be made compatible with, i.e., receivable on, existing NTSC receivers. This development made simulcasting practical, and changed many minds in the TV industry. Up to this point, the industry had heavily favored receiver-compatible systems, which turned out to be technically impossible.

On the strength of the Zenith development, the Commission decided in favor of a simulcasting strategy in which an extra channel would be given to each existing license holder who wanted one for the exclusive purpose of broadcasting HDTV. The same programs would be provided in the existing NTSC channels to serve existing receivers. After a certain period of time (later determined to be 15 years), NTSC would be shut down and the original NTSC channels returned to the Commission for reassignment. The TV industry went along with this decision, although reluctantly. The basis for the Commission's decision was a finding that moving to HDTV was in the public interest, and this plan was the best way to facilitate the change.

The simulcasting decision laid the groundwork for the later introduction of all-digital broadcasting by General Instrument. (The Zenith system was hybrid analog/digital.) Because of the much higher compression possible by digital methods, the GI proposal led to a new possibility that has fundamentally changed the entire TV outlook. Cable and satellite interests preferred to use this new technology to transmit several standard-definition programs — four to eight — in one channel rather than one HDTV program. This preference is based exclusively on these interests' expectations of higher profits with this approach.

No. of Copies rec'd 0  
UNABCODE

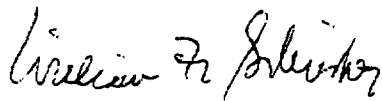


At one time, the terrestrial broadcasters believed that, since it was not possible to increase the total TV audience, having more channels would simply increase programming expenses, and would therefore hurt profits. Perhaps because of the contrary opinion held by most cable and satellite groups, the terrestrial broadcasters recently came to think that more standard-definition programs might be more profitable than one HDTV program for them as well. The NAB even went so far as to state the the new channels should be assigned without any requirements about how they were to be used. The outlandish nature of this point of view was immediately clear to many observers, including members of Congress. There began to be talk of placing some public-service restrictions on the new channels or even making the users pay for them.

I may have inadvertently contributed to this situation myself. In my submission to the Commission on 17 December 1991, I proposed, in order to facilitate the transition to HDTV, that the operators of these new channels should be allowed to use them for multiple standard-definition service for a limited number of hours during the daytime. In this way, they could provide a public service by making some of the channels available free to schools and local governments, and they could also have a new revenue stream to help pay the costs of the transition to HDTV. Of course, I made this proposal only in the context of an absolute commitment to move to HDTV on a specific schedule.

However this complicated situation eventually turns out, there is a very strong public interest in the matter. Television plays an important role in our country socially, politically, and educationally. It is more than a business. It can operate only by means of permission to use the publicly owned airwaves. The public should be given adequate opportunity to make its views known.

Very truly yours,



Cc:

Commr. James H. Quello  
Commr. Andrew C. Barrett  
Commr. Rachelle B. Chong  
Commr. Susan Ness  
Hon. Edward J. Markey  
Mr. Richard K. Wiley  
Mr. Larry Irving  
Dr. Robert Pepper, FCC

RECEIVED

AUG 23 1995

From: David Solomon  
To: A8.A8(RRATCLIF), A8.A8(SSHAPIRO)  
Date: 08/14/95 (Mon) 5:33pm  
Subject: Letters -Reply

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

To the extent they express views about the hdtv proceeding, they should go in the docket. You can accomplish this by sending an original and one copy to the Secretary with the docket number. Whether or not you guys decide to respond to them is a separate issue for you to decide. To the extent the letters are from Congress, there is a somewhat different standard in the rules for putting them in the record. See 47 C.F.R. Sec. 1.1206.

CC: A8.A8(RSTEWART),

MM 87-268

No. of Copies rec'd 1  
List A B C D E  
\_\_\_\_\_